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SENIOR VICE PRESIDENT
SECRETARY AND
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(A93- July 14, 1993

BY FACSIMILE AND REGULAR MAIL

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Mr. Andrew Park
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Air and Waste Management Division
Hazardous Waste Facilities Branch
Region II
26 Federal Plaza
New York, New York 10278

Re: Lenox China Facility
RFI Work Plan

Gentlemen:

This letter will summarize the agreements reached regarding certain RFI work plan comments during our meeting at the NJDEPE offices on July 12, 1993 and a telephone conference call on July 13, 1993. These agreements are in addition to those set forth in the July 12, 1993 Eder Associates letter to you. The comment numbers listed correspond to the same numbers in the NJDEPE and USEPA collective June 7, 1993 comment letter:

Comment #11:

Section 3.0 (general - ground water sampling) - Although two (2) additional rounds of ground water sampling for lead and zinc are required to determine if an impact to ground water has occurred, this does not necessarily mean that additional sampling for these constituents will not be required in the future. Since the facility has managed



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wastes that contain lead, zinc and trichloroethylene as major constituents, these constituents should be continued to be monitored, in addition to monitoring of ground water for Target Compound List plus 30 (TCL+30) on a less frequent basis.

Comment #19:

Section 3.0 (SWMU 5,p.15) - See comments 2,3,4, and 5 stated above. In addition, the work plan must contain a map or diagram which specifies the sediment sampling points for this SWMU.

Lenox has indicated in the test that the SWMU is clean and that no further action would be needed. The proposed sampling is to provide supporting evidence. However, the RFI work plan does not clearly state the purpose of the sampling for this or any other SWMU. The plan should be revised to include statements with regard to the purposes of the sampling. If the sampling is indeed to prove that the areas of the SWMUs are clean, Lenox must collect (in addition to the sediment samples), the soil samples beneath and/or in the sides of the unit. In addition, the soil and sediment samples must be analyzed for TCL+30 and the Target Analyte List (TAL).

Comment #20:

Section 3.0 (general SWMU's 6,7 and 8) - Soil sampling is proposed for SWMUs 6,7, & 8. Lenox indicated that the SWMUs are clean and that no further action would be needed. Again, the RFI work plan must clearly state the purposes of the sampling. If the sampling is indeed to prove that the areas of the SWMUs are clean and, therefore, no further action would be needed, the Department and EPA require that TCL+30 and TAL be analyzed for the proposed soil samples. Considering the sizes of SWMUs 6,7,and 8, the Department and EPA agree with the proposed numbers of samples for these SWMUs.

Response to Comments #11, #19 and #20:

In lieu of the monitoring of ground water and/or soil for the Target Compound List plus 30 (TCL+30) and the Target Analyte List (TAL), Lenox will provide in the revised RFI Work Plan a Chemical Constituents Inventory



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of all raw materials which were and continue to be used at the Lenox China facility in Pomona, New Jersey. This inventory will present all raw materials usage at the facility by major and minor classifications. Certain de-minimus usages, such as decals, will not be included. A certification of accuracy as to this Inventory will be provided pursuant to New Jersey Regulation 7:26E-1.5. If the Inventory includes constituents other than Lead, Zinc and TCE, Lenox will propose, if in its best professional judgment it believes monitoring is required, ground water and soil sampling plans for each SWMU based upon the Inventory.

Specifically with regard to #19, the Work Plan will contain a map or diagram specifying the sediment sampling points for SWMU 5 and statements with regard to the purposes of the sampling. If the purpose is to prove that the areas of this or any other SWMU is clean, Lenox will collect soil samples beneath and/or in the sides of the unit (in addition to the sediment samples).

Specifically with regard to Comment #20, Lenox will state in the RFI Work Plan with regard to SWMU 6, 7 and 8 the purposes of the sampling.

Comment #13:

Section 3.0 (general - SWMUs 1,2,3, and 9) - Lenox has indicated in the text that previously conducted investigations would satisfy the requirements of the RFI. It is recommended that Lenox submit the raw data to the Department for validation.

Response to Comment #13:

Data validation will not be required. Lenox will submit the results and laboratory reports (including whatever QA/QC documents accompany the report) of Appendix IX groundwater sampling of wells conducted in 1986. Lenox also will specify in the RFI Work Plan the precise locations in the Appendices of the RFI Work Plan of the raw data provided for those SWMUs.



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Comment #14:

Section 3.0 (SWMU 1,p.11) - Based on the results of the previous investigation, an additional soil investigation is not necessary. The proposed monitoring well location as plotted on the location map is acceptable for the purposes of monitoring the TCE plume at the Lenox property boundary. However, the width of the plume on-site has to be monitored. Since no wells are located on the northeast side of the property to monitor the plume width, an additional well, approximately 600 feet northeast of the degreaser sludge pit in the area between the baseball field and dense vegetation is needed.

Response to Comment #14:

It was clarified at the meeting on July 12, 1993 that this comment is not asking for a monitoring well in addition to that proposed in the Facility Investigation Work Plan but, rather, that the well proposed in the Plan should be relocated to a point agreed upon by the NJDEPE. Lenox will relocate the proposed well to an agreed upon point.

Comment #15:

Section 3.0 (SWMU 2, p.12) - As mentioned previously, the TCLP test is used for the classification of waste prior to disposal and is not to be used to characterize the site. In the text, Appendix D is referenced as having total lead results for seven (7) soil samples (the results of a soil investigation). This information was not presented in the text as stated. If this information is available please submit it, otherwise, additional soil sampling the **characterize** the site will be necessary. Lenox must amend the work plan to include a description of the soil investigation along with the analytical results.

The ground water monitoring parameters will include both lead and zinc.

Response to Comment #15:

This comment has been resolved by the agreed upon response to Item 7 set forth in the July 12, 1993 Eder Associates letter to Mr. Faranca. Vertical and horizontal soil sampling data already is sufficiently provided in the Work Plan.



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Lenox already has agreed to the ground water monitoring parameters of lead and zinc.

Comment #26:

Section 3.0 (SWMU 13, p.20) - The ground water analytical results collected from the August 13, 1991 sampling event do indicate that the Department's action level of 10 ppb of total lead has been exceeded which indicates that this unit is a possible source of contamination to ground water. In addition, the soil sampling that took place utilized composite sampling for the EP toxicity method (now revised to TCLP, for disposal purposes only), which is unacceptable for characterization of this SWMU. Moreover, the text indicates that the total lead concentrations in the slip and/or glaze waste is less than 600 ppm. This is not documented anywhere in Appendix D. In addition, the work plan does not identify the location or depths of any soil samples taken at this area of concern and does not present any analytical data regarding soil sampling results.

A figure in Appendix D shows the thickness of the waste sludge as delineated during the past investigation. However, the unit (i.e. inches, feet) which define the thickness is not indicated on the figure.

Based upon the above, Lenox must adequately delineate the vertical and horizontal extent of lead and zinc in this unit by additional soil sampling on a grid basis with discrete locations. Based upon the results of this sampling event, Lenox may be directed, pursuant to Part V of this NJPDES permit and Module III, condition B.6.a of the HSWA permit, to design and implement an Interim Remedial/Corrective Measure at this unit, to protect human health and the environment.

Response to Comment #26:

Lenox will propose in the Revised Work Plan a supplemental soil sampling program to confirm the horizontal extent of lead and zinc contamination for SWMU #13. This program will include samples at the edges of this SWMU taken vertically at intervals of 0 to 6 inches, 6 to 24 inches and in two-foot increments to groundwater. Samples will also be taken at several selected



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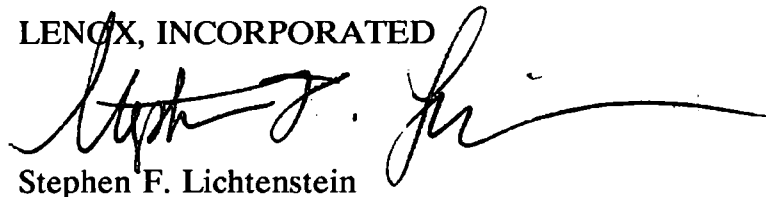
areas within the footprint of this SWMU where waste contamination is present. These soil samples will be analyzed for Lead, Zinc and TCE on a one time basis for characterization purposes. A groundwater sampling program of an existing downgradient well will also be proposed after consultation with Mr. Daryl Clark of the NJDEPE.

It was agreed that the revised RFI Work Plan will be submitted on or before August 30, 1993 and you will confirm this schedule directly to Lenox in writing.

To confirm the agreements reached during the meeting and conference call as set forth in this letter, would each of you please return your signed copy of this letter to Mr. John Kinkela.

Sincerely yours,

LENOX, INCORPORATED



Stephen F. Lichtenstein

cc: J.F. Kinkela
N.A. Andrianas, Eder Associates
G.W. Berman, P.E.

APPROVED BY:

Frank Faranca

Date

Andrew Park

Date